

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**SUZANNE GENEREUX and BARRY  
GENEREUX, Individually and as Parents  
And Natural Guardians of their minor  
children, ANGELA GENEREUX and KRISTA  
GENEREUX,  
Plaintiffs**

**v.**

**AMERICAN BERYLLIA CORP., BRUSH  
WELLMAN, INC., BRUSH WELLMAN  
CERAMICS, INC., BRUSH WELLMAN  
CERAMIC PRODUCTS, INC., HARDRIC  
LABORATORIES, INC., KYOCERA  
AMERICA, INC., KYOCERA INDUSTRIAL  
CERAMICS CORP., and RAYTHEON  
COMPANY,  
Defendants**

**Case No. 04-CV-12137 JLT**

**INITIAL DISCLOSURE OF DEFENDANT, AMERICAN BERYLLIA CORP.,  
PURSUANT TO RULE 26(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

The defendant American Beryllia, Inc. hereby makes its initial disclosure in accordance with Rule 26(a) of the Federal Rules of Civil Procedure.

- A. Individuals likely to have discoverable information based upon information now reasonably available:
1. Dino Nicoletta, President and CEO of American Beryllia, Inc., 16 First Avenue, Haskell, N.J. 07420, common knowledge of the formation of American Beryllia, Inc. and sale of products to Raytheon;
  2. Howard Appel, formerly Director of Manufacturing, 535 Brennan Court, Fairlawn, N.J. 07410, common knowledge of sale of American Beryllia products and General Ceramics' products to Raytheon;
  3. Robert Gogolen, Plant Manager of American Beryllia, Inc., 16 First Avenue, Haskell, N.J. 07420, knowledge of sales of American Beryllia and General Ceramics' products to Raytheon;

4. Hobart Truesdell, Walker, Truesdell, Rodick & Associates, 380 Lexington Ave., Suit 1514, New York, N.Y. 10168, sole shareholder, director and President of General Ceramics at its dissolution;
5. John Doyno, 489 Essex St., Hackensack, N.J. 07601, knowledge of Haskell Properties' purchase of General Ceramics' assets; and
6. Larry Feinsinger, address unknown, knowledge of Haskell Properties' purchase of General Ceramics' assets.

B. Copies or description of Documents:

Based upon information now reasonably available, accompanying this Disclosure Document are copies of documents in the possession, custody or control of the defendant American Beryllia that are relevant to the disputed facts alleged, excluding documents expected to be used solely for impeachment.

In addition, there are documents relevant to the disputed facts alleged that are currently stored at the defendant's plant in Haskell, N.J. These documents will be made available for inspection and copying at a mutually convenient time. The following is a description of the documents that remain in the Haskell facility:

- Drawings;
- Part number lists that identify by part number customer purchases;
- Air quality tests of the Haskell facility;
- Specification sheets for products;
- Material Safety Data Sheets for products;
- Packaging instructions;
- Warning labels;
- In-house training tapes and video cassettes;
- Invoices; and
- Customer lists, detailing purchases by customer number.

C. Computation of Damages:

This disclosure requirement is not applicable to the defendant American Beryllia.

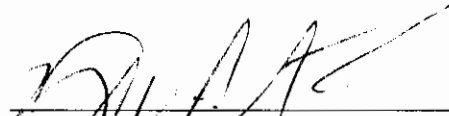
D. Liability Insurance:

American Beryllia's insurance agreement with Mt. Hawley Insurance Company is available for inspection at our offices at a mutually convenient time. Please be advised that Mt. Hawley Insurance Company is defending American Beryllia under a reservation of rights.

The defendant reserves the right to supplement and/or amend these disclosures as appropriate as the litigation proceeds.

Respectfully submitted.

**CLARK, HUNT & EMBRY**

  
\_\_\_\_\_  
William P. Ahern, Jr. (013365)  
Mandi Jo Hanneke (657349)  
55 Cambridge Parkway  
Cambridge, MA 02142  
(617) 494-1920

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A TRUE COPY OF THE ABOVE DOCUMENT  
WAS SERVED UPON THE ATTORNEY OF RECORD FOR EACH

OTHER PARTY BY MAIL (BY HAND) ON

10/26/05

